

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SARAH LINDSLEY,

Plaintiff,

v.

TRT HOLDINGS, INC., et al.,

Defendants.

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Civil Action No. 3:17-CV-02942-X

PLAINTIFF’S TRIAL WITNESSES

Pursuant to this Court’s Amended Scheduling Order (Doc. 306), Local Rule 26.2 and Judge Brantley Starr’s local rules, Plaintiff Sarah Lindsley (“Plaintiff”), by and through her attorneys, files this Trial Witness List for identification and categorization of trial witnesses. Plaintiff reserves the right to identify and/or call rebuttal witnesses and/or other witnesses in response to Defendants’ pretrial disclosures.

At this time, Plaintiff identifies the following witnesses for trial:

Witness Name	Narrative Summary of Testimony	Whether Witness was Deposed	Witness Testimony at Trial
Sarah Lindsley	Sarah Lindsley is the Plaintiff. She will testify about her work history with Defendants, her knowledge of pay disparities, her complaints of pay discrimination, and Defendants’ failure to investigate her complaints. She will also testify about her claims and damages.	Yes	Probable
Robert Rowling	Robert Rowling is the former CEO of Omni Hotels. He will testify about Plaintiff’s workplace complaints of pay discrimination.	No	Probable

Joy Rothschild	Joy Rothschild is the Chief Human Resources Officer. She will testify about Plaintiff's work history, compensation history, and workplace complaints. She will also testify about the Defendants' compensation policies, employee training, and any pay equity analyses performed.	Yes	Probable
Susan Gilbert	Susan Gilbert was the Director of Human Resources at Omni Corpus Christi. She can testify about Plaintiff's job performance, workplace complaints, her involvement in any investigation into Plaintiff's complaints, and her knowledge about Plaintiff's pay disparity.	Yes	Via Deposition testimony
Dean Sprague	Dean Sprague was the executive chef at Omni Corpus Christi and under the supervision of Plaintiff during her employment. He will testify about her work performance, the work performance and experience of her predecessor Daniel Cornelius, his knowledge about Plaintiff's workplace complaints, and any investigation he participated in as a result of Plaintiff's complaints.	Yes	Probable
Claudio Cid	Claudio Cid was the Director of Human Resources at Omni Corpus Christi and verbally offered Plaintiff \$65,000 for the Assistant Director of Human Resources position. He can testify about the pay scale for that position, any discussions with corporate about the salary offered to Plaintiff for the position, and the complaints Plaintiff made	No	Possible

	regarding the written salary offer presented.		
Barbara Doucet	Barbara Doucet was the Vice President of Human Resources at Omni. She will testify about the Company's investigation into Plaintiff's pay discrimination complaints.	No	Possible
Shawn Campbell	Shawn Campbell was the Director of Banquets under the supervision of Plaintiff. He will testify about Plaintiff's work performance, his knowledge of her pay discrimination complaints, and his knowledge about any investigation that took place.	Yes	Probable
Devin Burns	Devin Burns is the Vice President of Room and Food & Beverage. He can testify about the food and beverage division, including his knowledge of relevant policies, and his knowledge of the experience and compensation paid to Plaintiff's predecessors.	Yes	Via Deposition Testimony

Daniel Cornelius	Daniel Cornelius was Plaintiff's immediate predecessor at Omni Corpus Christi. He can testify about his experience and responsibilities in the position, his compensation in the position, his prior experience, his resignation, his experience working with Plaintiff, and any communications he had with Plaintiff about compensation	No	Possible
Jason Polland	Jason Polland was Plaintiff's predecessor. He can testify about his experience and responsibilities in the position, his compensation in the position, and his prior work experience.	No	Possible
Robert Walker	Robert Walker was Plaintiff's predecessor. He can testify about his experience and responsibilities in the position, his compensation in the position, and his prior work experience.	No	Possible
Burton Kittay	Burton Kittay was Plaintiff's treating mental health provider during her employment at Omni Corpus Christi. He can testify about his knowledge of the emotional distress she suffered as a result of her employment.	No	Possible

Dated: March 24, 2025

Respectfully submitted,

By: /s/ Jay D. Ellwanger

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2025, a true and correct copy of the above and foregoing document was served on all counsel of record via the Courts ECF system.

/s/ Jay D. Ellwanger

Jay D. Ellwanger